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Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S. W.  
TW-A325  
Washington, DC 20554

Re: In the Matter of Amendment of the Commission's Rules  
with Regard to the 3650-3700 MHZ Government Transfer Band  
ET Dkt.No. 98-237

Dear Ms. Salas:

Transmitted herewith, on behalf of Telephone and Data Systems, Inc., are an original and four copies of its reply comments in the above-referenced matter.

In the event there are any comments or questions concerning this matter, please direct them to the undersigned.

Very truly yours,

  
George Y. Wheeler

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of the Commission's Rules ) ET Docket No. 98-237  
with Regard to the 3650-3700 MHZ )  
Government Transfer Band )

To: The Commission

REPLY COMMENTS OF  
TELEPHONE AND DATA SYSTEMS, INC.

Telephone and Data Systems, Inc., on behalf of itself and its subsidiaries (collectively "TDS"), by its attorneys, submits its reply comments in response to the Commission's Notice of Proposed Rule Making and Order ("NPRM"), released December 18, 1998 in the above-captioned proceeding.

TDS agrees with the numerous commentors<sup>1</sup> who have filed in support of the Commission's reallocation of the 3650-3700 MHZ band for fixed wireless services. Particularly for service to rural and high cost areas, it is essential that incumbent providers, including rural telephone companies and others, have opportunities to be licensed for such emerging technologies to promote cost-effective deployment of advanced telecommunications capabilities.

TDS also agrees with Blooston, NCTA and RTG that the geographic service areas for licensing in this band should not be based on nationwide or large regional markets. TDS proposed that the Commission adopt Basic Trading Areas or Economic Areas but could also support service

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<sup>1</sup> Blooston, Mordkofsky, Jackson & Dickens ("Blooston"), InnoWave Tadiran Telecommunications Wireless Systems Ltd., Lucent Technologies, Inc., Motorola, Inc., National Telephone Cooperative Association ("NCTA"), Northern Telecom, Inc. ("Nortel"), The Rural Telecommunications Group ("RTG"), SR Telecom, Inc. and TRANSCOMM, Inc.

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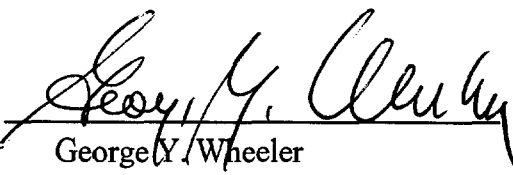
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area alternatives such as Metropolitan Statistical Areas and Rural Service Areas as proposed by RTG.

TDS proposed in its Comments a channelization plan which was intended to support the Commission's longstanding pro-competitive goals and to foster service to rural and high cost areas. The TDS channelization proposal (three blocks...20 MHz, 20 MHz and 10 MHz) was predicated on the fact that the total spectrum available for fixed wireless services in this band would be limited to 50 MHz. If additional spectrum could be combined with the 3650-3700 MHz band, as proposed by Nortel and others, TDS would support Commission consideration of other channelization proposals which offer licensees expanded bandwidth. If, on the other hand, such additional spectrum cannot be made available, the Commission should not adopt a channel plan which fails to offer multiple licensing opportunities in each service area. Even with bandwidth in limited quantities, TDS believes that the proposed reallocation will make possible effective deployment of emerging technologies and competitive incentives providing important consumer benefits particularly for residents of rural areas.

Respectfully submitted,

TELEPHONE AND DATA SYSTEMS, INC.

By   
George Y. Wheeler

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March 1, 1999

Its Attorneys

## CERTIFICATE OF SERVICE

I, Judy Norris, a legal secretary in the firm of Koteen & Naftalin, L.L.P., hereby certify that on the 1<sup>st</sup> day of March 1999, copies of the foregoing "Reply Comments of Telephone and Data Systems, Inc." were deposited in the U.S. mail, first-class, postage prepaid, addressed to:

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